

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

ASHEVILLE DIVISION

CARYN DEVINS STRICKLAND,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil No. 1:20-cv-00066-WGY
)	
UNITED STATES, <i>et al.</i>,)	
)	
<i>Defendants.</i>)	

PLAINTIFF’S NOTICE OF CHALLENGE TO CONFIDENTIALITY DESIGNATION

Pursuant to paragraphs D(1)-(6) of the Court’s Stipulated Protective Order Regarding Confidential Information (“Protective Order”), ECF No. 183, Plaintiff respectfully submits this Notice of Challenge to Confidentiality Designation over materials contained in proffered Exhibit BB, which contains materials relating to other EDR complaints filed against the Federal Defender Office (“FDO”) for the Western District of North Carolina.

The Court’s Protective Order allows the parties to designate certain information produced in discovery as confidential and establishes a procedure for challenging such designations. Specifically, the “Challenging Party shall initiate” such a challenge “by providing to the Designating Party (a) written notice of each designation it is challenging and (b) a description of the basis of each challenge.” ECF No. 283 at D(2). If the parties cannot reach a resolution after a seven-day meet and confer period, “the Challenging Party shall file with the Court its written notice of the challenged designations.” *Id.* at D(5).

On April 19, 2024, Plaintiff served on Defendants a notice challenging their confidentiality designations related to Exhibit BB. That notice is attached as Exhibit A. On

April 24, 2024, Defendants' counsel informed Plaintiff's counsel that Defendants would not agree to withdraw the confidentiality designation over this material. Accordingly, Plaintiff hereby challenges those confidentiality designations. For the reasons explained in Plaintiff's notice, this Court should strike Defendants' confidentiality designation and allow Plaintiff to file the materials on the public docket.

This the 25th day of April, 2024.

Respectfully Submitted,

/s/ Cooper Strickland

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of April, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Joshua M. Kolsky at Joshua.Kolsky@usdoj.gov

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